

ATTACHMENT 1

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of  
HOUSTON LIGHTING AND  
POWER COMPANY, ET AL.

(South Texas Project,  
Units 1 and 2)

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Docket Nos. 50-498 OL  
50-499 OL

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USNRC

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DOCKETING & SERVICE  
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CITIZENS CONCERNED ABOUT NUCLEAR POWER, INC. (CCANP)  
MOTION FOR ADDITIONAL DISCOVERY

On March 14, 1984, the Atomic Safety and Licensing Board in this proceeding issued its Partial Initial Decision. ASLBP No. 79-421-07 OL. As part of that decision, the Board directed the NRC Staff "(and the Applicants and other parties if they wish)" to provide a report on "safety related construction activities (including implementation of the QA/QC program) following the assumption of duties by Bechtel and Ebasco." Id. at 6: See also Id. at 56-57, 286.

In essence, the Board has extended into the second phase of the operating license proceeding the inquiry posed by Issue B, i.e. whether the remedial actions taken by HL&P provide a sufficient basis for concluding that HL&P has the necessary character and competence to receive an operating license for a nuclear power plant.

The Partial Initial Decision was the first notice CCANP had that the record on Issue B would be extended during Phase II.

This extension of the issue is in part recognition of arguments presented by Citizens Concerned About Nuclear Power, Inc. (CCANP) in its Findings of Fact and Conclusions of Law for

Phase I of this proceeding. Id. at 55-56.

In order to be adequately prepared to participate in the litigation of this issue, CCANP requires further discovery on the performance of HL&P, Bechtel, and Ebasco since the transition from Brown and Root to Bechtel and Ebasco.

For the above and foregoing reasons, CCANP moves the Board to provide ninety (90) days of discovery to CCANP regarding this performance.

Respectfully submitted,

Lanny Sinkin  
Representative for Intervenor  
Citizens Concerned About  
Nuclear Power, Inc.

114 W. 7th, Suite 220  
Austin, Texas 78701  
(512) 478-7197

Dated: March 29, 1984

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of

HOUSTON LIGHTING AND  
POWER COMPANY, ET AL.  
(South Texas Project,  
Units 1 and 2)

Docket Nos. 50-498 OL  
50-499 OL  
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CERTIFICATE OF SERVICE

I hereby certify that copies of CITIZENS CONCERNED ABOUT NUCLEAR POWER, INC. (CCANP) MOTION FOR ADDITIONAL TIME were served by deposit in the U.S. Mail, first class postage paid to the following individuals and entities on the 6th day of April 1984.

Alan S. Rosenthal, Esquire  
Chairman  
Atomic Safety and Lic. Appeal Bd.  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. John H. Buck  
Administrative Judge  
Atomic Safety and Lic. Appeal Bd.  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Charles Bechhoefer, Esquire  
Chairman  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. James C. Lamb, III  
Administrative Judge  
313 Woodhaven Road  
Chapel Hill, North Carolina 27514

Ernest E. Hill  
Administrative Judge  
Hill Associates  
210 Montego Drive  
Danville, California

Mrs. Peggy Buchorn  
Executive Director, C.E.U.  
Route 1, Box 1684  
Brazoria, Texas 77422

William S. Jordan, III, Esq.  
Harmon, Weiss & Jordan  
2001 S Street, N.W., Suite 430  
Washington, D.C. 20009

Pat Coy  
5106 Casa Oro  
San Antonio, Texas 78233

Christine N. Kohl  
Administrative Judge  
Atomic Saf. & Lic. App. Bd.  
U. S. Nuclear Reg. Comm.  
Washington, D.C. 20555

Brian Berwick, Esquire  
Asst. Atty. Gen.  
State of Texas  
Environmtl. Protection  
P. O. Box 12548, Capitol Sta.  
Austin, Texas 78711

Robert G. Perlis, Esquire  
Office of the Exec. Leg. Dir.  
U.S. Nuclear Regulatory Comm.  
Washington, D.C. 20555

Jack R. Newman, Esquire  
1025 Connecticut Avenue, N.W.  
Washington, D.C. 20036

Melbert Schwarz, Esquire  
Baker and Botts  
300 One Shell Plaza  
Houston, Texas 77002

Atomic Safety and Licensing Bd.  
U.S. Nuclear Regulatory Comm.  
Washington, D.C. 20555

Atomic Safety and Licensing  
Appeal Board  
U.S. Nuclear Regulatory Comm.  
Washington, D.C. 20555

Docketing and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Comm.  
Washington, D.C. 20555

*Lanny Sinkin*  
Lanny Sinkin